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September 23, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Draft EMD OP GT.30 - In-situ Characterization of Radionuclides

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G. As you will see from the attached comments, the Division believes that this procedure does not fully describe all aspects of radionuclide characterization that will be used or has been proposed for IHSS investigation under the IAG.

The Division understands that this procedure is already being used in field investigations. We support this effort to get the field programs underway. However, late submittal of this as yet unapproved procedure places on DOE the burden of assuring useable quality controlled radionuclide data.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

cc: Martin Hestmark, EPA
Jen Pepe, DOE
Mike Arndt, EG&G
Marla Broussard, EG&G
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